

February 22, 2002

**VIA OVERNIGHT DELIVERY**

Mary L. Cottrell  
Secretary  
Department of Telecommunications & Energy  
Commonwealth of Massachusetts  
One South Station, Second Floor  
Boston, MA 2110

**RE: D.T.E. 02-15, Investigation into the Regulations, Practices,  
Equipment, Appliances, and Service of Network Plus, Inc.**

Dear Ms. Cottrell:

Please accept for filing in the above-referenced proceeding the original and one copy of the attached Petition for Leave to Intervene of PaeTec Communications, Inc. ("PaeTec"). As required by the Notice of Investigation and Public Hearing issued February 20, 2002, an electronic copy of this filing has also been e-mailed to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us) and [Paula.Foley@state.ma.us](mailto:Paula.Foley@state.ma.us).

Kindly date stamp and return the enclosed extra copy of the Petition for our files. Please do not hesitate to contact me if you have any questions.

Sincerely,

JT Ambrosi  
Vice President, Carrier and Government Relations

**BEFORE THE  
MASSACHUSETTS DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of	)	
Telecommunications and Energy on	)	
its own motion pursuant to G.L. c. 159,	)	D.T.E. 02-15
§§ 12 and 16, into the regulations,	)	
practices, equipment, appliances, and	)	
service of Network Plus, Inc.	)	

**PETITION FOR LEAVE TO INTERVENE  
OF PAETEC COMMUNICATIONS, INC.**

PaeTec Communications, Inc. ("PaeTec"), pursuant to 220 C.M.R. § 1.03, hereby petitions the Department for leave to intervene in the above-captioned proceeding. PaeTec is authorized to provide telecommunications services in the Commonwealth of Massachusetts.<sup>1</sup> As a provider of services within the Commonwealth, PaeTec requests that it be permitted to intervene as a party in order to adequately represent and protect its interests.

PaeTec is substantially and specifically affected by this proceeding because it may be called upon to migrate customers to its own network within the Commonwealth as a result of Network Plus' bankruptcy filing. Since this proceeding will review customer service options when a carrier files for bankruptcy, PaeTec will be directly impacted by any changes the Department might choose to make in those policies as it accommodates customers from other carriers. PaeTec's participation in this proceeding will help ensure the development of a comprehensive record, while affording PaeTec the opportunity to protect its interests.

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<sup>1</sup> PaeTec's Statement of Business Operations and Initial Tariff were filed with the Department on July 21, 1998.

Accordingly, pursuant to 220 C.M.R. § 1.03, PaeTec petitions the Department for leave to intervene and participate as a party in the above-captioned proceeding.

Respectfully submitted,

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JT Ambrosi  
Vice President, Carrier and Government Relations

Dated: February 22, 2002